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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

RICHARD AMMAR CHICHAKLI,  
a/k/a "Robert Cunning,"  
a/k/a "Raman Cedorov,"

Defendant.

**PROTECTIVE ORDER**

S2 09 Cr. 1002 (WHP)

WILLIAM H. PAULEY III, District Judge:

On the motion of the United States of America, by Preet Bharara, United States Attorney, by Christian R. Everdell, Jenna M. Dabbs, and Ian McGinley, Assistant United States Attorneys, of counsel:

IT IS HEREBY ORDERED THAT:

1. The following documents and other material provided by the Government in discovery, and/or marked by the Government as subject to this Protective Order, to the extent that such documents and other material are not already in the public domain as of the date of the signing of this Order, shall be treated as "Confidential Information":

(a) The contents of the laptop computer seized from Viktor Bout at the time of his arrest in Bangkok, Thailand in or about March 2008, which

- are marked with the Bates prefix "BOU TLAPTOP";
- (b) E-mails between CHICHAKLI and Robert Peacon, which are marked with the Bates prefix "NDTX-PEACON";
  - (c) Third-party bank records, wire transfer records, and other financial records, which are marked with the Bates prefix "BANK";
  - (d) Documents from Aventura Aviation related to aircraft purchases involving CHICHAKLI, which are marked with the Bates prefix "AVENTURA";
  - (e) Audio recordings and transcripts of consensually recorded conversations between CHICHAKLI and cooperating witnesses, which are marked with the Bates prefixes "AUDIO" and "TRNSCRPTS"; and
  - (f) Third-party bank records, wire transfer records, contracts, agreements, memoranda, correspondence, e-mails, and other financial and business records obtained by the Office of Foreign Assets Control ("OFAC") in the course of their investigation of CHICHAKLI, which are marked with the Bates prefix "OFAC-THIRDPARTY-DOCS";

2. Confidential Information disclosed to the defendant or to his standby counsel during the course of proceedings in this action:

- (a) Shall be used by the defendant or his standby counsel only for purposes of this action.
- (b) Shall not be disclosed in any form by the defendant or his standby counsel except as set forth in paragraph 2(c) below.
- (c) May be disclosed by the defendant or his standby counsel only to the following persons (hereinafter "designated persons"):
  - (i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by defendant's standby attorneys;
  - (ii) independent expert witnesses, investigators or advisors retained by defendant in connection with this action;
  - (iii) such other persons as hereafter may be authorized by the Court upon such motion by defendant.
- (d) Shall be held by standby defense counsel, the defendant, and/or prison officials. The defendant shall not distribute Confidential

Information to others;

- (e) Shall be returned to the Government or destroyed following the entry of either a final judgment in this case, or, in the event of an appeal and/or the filing of a motion under 18 U.S.C. § 2255, immediately following the disposition of the appeal and/or the § 2255 motion, absent further Order of the Court.

This Order also applies to any copies – electronic, hard copy, or otherwise – that may have been made.

3. The defendant and his standby counsel shall provide a copy of this Order to designated persons to whom they disclose Confidential Information pursuant to paragraph 2(c). Designated persons shall be subject to the terms of this Order.

4. In the event of a change of standby counsel, subsequent standby counsel are bound by the terms of this Protective Order.

Dated: New York, New York  
August 30, 2013

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.